

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 5202, 5203, 5204, 5619,
6728, 6740 & 6784

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On December 27, 2023, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5202] (the “Motion”), as well as the *Declaration of Sabrina T. Howell in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5203] and the *Declaration of Kevin Lu in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5204].²

2. On January 11, 2024, the Official Committee of Unsecured Creditors appointed in these chapter 11 cases (the “Committee”) filed the *Statement of Official Committee of Unsecured Creditors in Support of Motion to Estimate Claims Based on Digital Assets* [D.I. 5619].

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the Motion.

3. On January 28, 2024, the Debtors filed the *Debtors' Omnibus Reply in Support of Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 6728] (the "Reply").

4. On January 28, 2024, the Ad Hoc Committee of Non-US Customers of FTX.com (the "Ad Hoc Committee") filed *The Ad Hoc Committee of Non-US Customers of FTX.com's Statement in Response to the Motion of Debtors to Estimate Claims Based on Digital Assets and Objections Thereto* [D.I. 6729].

5. The Debtors received formal responses and informal comments from numerous parties as listed in Exhibit A to the *Notice of Agenda for Hearing Scheduled for January 31, 2024 at 10:30 a.m. (ET), Before the Honorable John T. Dorsey at The United States Bankruptcy Court for The District of Delaware, Located at 824 North Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801* [D.I. 6740].

6. On January 31, 2024, the Debtors filed the *Notice of Filing of Revised Order* [D.I. 6784] (the "Notice").

7. On January 31, 2024, the Court held a hearing (the "Hearing") to consider, among other things, entry of the Order approving the Motion.

8. The Debtors have revised the proposed order (the "Revised Order") consistent with the record at the Hearing, a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed form of order attached to the Notice is attached hereto as **Exhibit B**.

9. The Revised Order has been circulated to the Office of the United States Trustee (the "U.S. Trustee"). Counsel for the U.S. Trustee has reviewed the Revised Order and believes that it is consistent with the Court's ruling on the Motion at the Hearing. The Revised Order also has been circulated to counsel to the following parties: the Committee, Maps Vault Ltd., Fondation

Serendipity, Fondation Elements, Serendipity Network Ltd., Liquidity Network Ltd, TMSI SEZC Ltd., LayerZero Labs Ltd., Ari Litan and Skip & Goose LLC (collectively, the “Parties”). The Parties have reviewed the Revised Order and believe the Revised Order is consistent with the Court’s ruling on the Motion at the Hearing and have no objection to entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

10. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: February 2, 2024
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession